

### **REMARKS**

This paper is presented in response to the final official action dated February 24, 2009, wherein (a) claims 1 and 3-14 were pending, (b) claims 1, 3, 6, 8, 13, and 14 were rejected as obvious over Grohs et al. US 2003/0169446 A1 ("Grohs") in view of Gassho US 7,136,486 ("Gassho"), (c) claims 4, 5, 9, and 10 were rejected as obvious over Grohs in view of Gassho and further in view of Che-Mponda et al. US 2003/0069801 A1 ("Che-Mponda"), (d) claims 7 and 11 were rejected as obvious over Grohs in view of Gassho and further in view of Gluckman US 2002/0161744 A1 ("Gluckman"), and (e) claim 12 was rejected as obvious over Grohs in view of Gassho and further in view of Che-Mponda and McLaughlin, "Java & XML, 2<sup>nd</sup> Edition: Chapter 12: SOAP" ("McLaughlin").

Claims 1 and 8 have been amended to recite that data generated by the print job generation element comprise control characters for an enveloping machine. Support is found at page 2, paragraph [0035] of the of the US publication of this application.

Entry of the amendments is believed to be proper, and is solicited, as they place the application in condition for allowance or in better form for consideration on appeal, and could not have been earlier presented, as the outstanding rejections were first raised in the most recent official action.

Reconsideration of the application, as amended, is solicited.

The examiner states in the official action at page 3, 3<sup>rd</sup> paragraph that, according to his opinion, the mailpieces of the present invention are considered to be normal documents because the claimed invention does not explicitly contain a mailing step. However, such an approach is not logical insofar as amended claims 1 and 8 are directed to a system and method, respectively, for automatically generating printable files for mailpieces. Of course, such a device or method usually does not contain a mailing machine but may, however, be connected to one. Therefore, the applicants respectfully disagree with the examiner's position, and the outstanding obviousness rejections are accordingly traversed.

None of the applied references provides a system or method according to amended claims 1 and 8 or gives any hint as to how known systems or methods could be modified to arrive at the claimed system and method. In addition, the claimed system and method show advantages over those presented in the prior art. The system and method according to the invention are clearly designed to produce printed mail-pieces for users including control characters for enveloping machines. Printing of mail-pieces is much more complicated in comparison to usual print jobs, as for documents as described by Grohs. This is not only because they contain control characters for an enveloping machine but also because they may additionally contain information pages for the personnel, crop marks, paper formats, the production of RIP tickets for printers, SDL control characters, conversion instructions, and instructions on how the data are transported to a printer. See page 2, paragraph [0035] of the US publication of this application.

Because of this, the complexity of connected printing systems that handle these data is very high due to different hardware, such as enveloping machines for which control characters have to be included. Because each of the printing service providers has its own specific printing system with different software and hardware components, it is a problem explicitly mentioned to be solved by this invention that uniform preparation of user jobs and transmittal to the particular printing system of the service provider could only be managed, if the postal service provider has knowledge of all of the hardware- and software-specifications of the commissioned printing service provider. This, in turn, calls for extensive hardware and software on the part of the postal service provider as well, which is expensive and therefore should be avoided. See paragraph [0010] of the US publication text.

This problem is solved by the system and method as defined in amended claims 1 and 8, respectively, especially by the fact that the print job generation element is explicitly not part of the database, but part of the printing system of the commissioned printing service provider itself and by the fact that the print files include control characters for an enveloping machine.

Amended claims 1 and 8 make it clear that the documents mentioned in Grohs cannot be regarded as equivalent for the mailpieces of the present invention.

In addition, a person of ordinary skill would not combine Grohs with Gassho, because the print job data generator is part of the content server, i.e. the database of the present invention. This is also necessary for the technical teaching of Gassho because its focus is to provide a system or method which helps to prevent unauthorized multiple copy-prints of copyright-protected data (see Gassho at column 1, lines 35 to 39). This technical necessity is contradictory to a purpose of the present invention.

Thus, the present invention cannot be regarded as obviously leading from a combination of Grohs and Gassho, because the technical teaching of those two references cannot properly be combined. Besides that, none of the applied references mentions the creation of print jobs for mailpieces and also the generation of data comprising control characters for an enveloping machine.

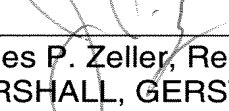
The remaining applied references do not supply these deficiencies, and indeed have not been cited to supply these deficiencies between the state of the art and the presently-claimed invention.

For all the foregoing reasons, an indication of allowability of all claims 1 and 3-14 is solicited.

Should the examiner wish to discuss the foregoing or any matter of form in an effort to advance this application toward allowance, the examiner is urged to telephone the undersigned at the indicated number.

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Respectfully submitted,

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